

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IPC International Corporation,)	
)	
Plaintiff,)	
)	
vs.)	
)	
Liberty Mutual Insurance Company,)	
Liberty Mutual Fire Insurance)	
Company, Liberty Insurance)	Case No. 1:12-cv-07294
Corporation, The First Liberty)	
Insurance Corporation, Employers)	Judge Edmond E. Chang
Insurance of Wausau A Mutual)	
Company, Wausau General Insurance)	Mag. Judge Susan E. Cox
Company, Wausau Underwriters)	
Insurance Company, and Wausau)	
business Insurance Company,)	
)	
Defendants.		

**DEFENDANTS' UNOPPOSED MOTION TO
EXTEND THE TIME TO RESPOND TO PLAINTIFF'S
COMPLAINT AND TO MODIFY OTHER CALENDAR DATES**

Defendants Liberty Mutual Insurance Company, Liberty Mutual Fire Insurance Company, Liberty Insurance Corporation, The First Liberty Insurance Corporation, Employers Insurance of Wausau A Mutual Company, Wausau General Insurance Company, Wausau Underwriters Insurance Company, and Wausau Business Insurance Company ("Defendants"), respectfully move this Court to extend the time for Defendants to answer, move or otherwise respond to the Complaint until November 6, 2012. In support of this motion, Defendants state the following:

1. On September 12, 2012, Plaintiff IPC International Corporation ("Plaintiff" or "IPC") filed the Complaint in this action.
2. By order dated October 5, 2012, defendants were given until October 23, 2012 to answer, move or otherwise respond to the Complaint.

3. After that order was entered, counsel for defendants discovered that certain of the named defendants are Illinois corporations, and therefore, this Court does not have a basis for exercising diversity jurisdiction under 28 U.S.C. § 1332. Counsel for defendants provided this information to IPC's counsel on October 16, 2012 and has requested that IPC voluntarily dismiss the Complaint for lack of subject matter of jurisdiction. IPC's counsel is in the process of reviewing this information.

4. Accordingly, to enable IPC's counsel to complete their review, defendants request a two-week extension from October 23, 2012 up to and including November 6, 2012 to answer, move or otherwise respond to the Complaint.

5. This request for an extension of time is made in good faith and not for the purpose of delaying these proceedings, unfairly prejudicing plaintiff or interfering with the Court's docket.

6. In addition, for the same reasons, defendants respectfully request that the Court postpone the dates for the parties' initial Rule 26(a)(1) disclosures, the joint status report (currently due October 24, 2012), and the initial status hearing (currently scheduled for October 29, 2012) an additional two weeks.

7. Counsel for both sides have communicated concerning the proposed extension and schedule modification, and IPC's counsel has indicated IPC agrees with the relief sought by this motion.

WHEREFORE, defendants respectfully request that the Court enter an order (i) granting this Motion for Extension of Time to Respond to the Complaint and allow defendants up to and including November 6, 2012 to answer, move or otherwise respond to plaintiff's Complaint; (ii) postponing the dates for the parties' initial Rule 26(a)(1) disclosures, the joint status report, and the initial status hearing an additional two weeks; and (iii) making any other relief considered just and necessary under the circumstances.

DATED: October 18, 2012

Respectfully submitted,

EDWARDS WILDMAN PALMER LLP

s/ Lisa S. Simmons

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Counsel for:

Liberty Mutual Insurance Company, Liberty Mutual Fire Insurance Company, Liberty Insurance Corporation, The First Liberty Insurance Corporation, Employers Insurance of Wausau A Mutual Company, Wausau General Insurance Company, Wausau Underwriters Insurance Company, and Wausau business Insurance Company,

CERTIFICATE OF SERVICE

I, Lisa S. Simmons, an attorney, hereby certify that on the 18th day of October, 2012, a true and correct copy of **Defendants' Unopposed Motion to Extend the Time to Respond to Plaintiffs' Complaint and to Modify Other Calendar Dates**, was electronically filed with the Clerk of the Court for the Northern District of Illinois using the CM/ECF system. Notice of this filing will be sent to all parties by operation of the court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

s/Lisa S. Simmons
Lisa S. Simmons